

# EXHIBIT W

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

JANE ROE, individually and on )  
behalf of all others similarly )  
situated, )

Plaintiffs, )

vs. )

No. 1:12-cv-02288-JG

Pages 1 - 206

INTELLICORP RECORDS, INC., an )  
Ohio corporation and DOES )  
1-50, inclusive, )

Defendants. )

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VIDEOTAPED DEPOSITION OF JANE ROE

LOS ANGELES, CALIFORNIA

TUESDAY, JANUARY 22, 2013

REPORTED BY:

LESLIE L. WHITE

CSR NO. 4148

JOB NO.: 56990

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1 LOS ANGELES, CALIFORNIA; TUESDAY, JANUARY 22, 2013

2 9:33 a.m.

3 -o0o-

4 THE VIDEOGRAPHER: This is start of disc No. 1  
5 of the videotaped deposition of Jane Roe, being  
6 taken in the matter of Jane Roe v. IntelliCorp  
7 Records, Inc. being held in the United States  
8 District Court, Northern District of Ohio, Case  
9 No. 1:12-cv-02288-JG.

10 The deposition is being held at 1800  
11 Century Park East, Los Angeles, California on  
12 January 22nd, 2013 at approximately 9:32 a.m.

13 My name is Chris Jordan with TSG  
14 Reporting. The court reporter is Leslie White with  
15 TSG Reporting.

16 Will counsel please state your name for  
17 the record.

18 MR. KIM: Joshua Kim from A New Way of Life  
19 Reentry Project, on behalf Ms. Jane Roe.

20 MS. CARUSO: Gina Caruso of Davis Polk &  
21 Wardwell. I'm here today with my colleague, Lauren  
22 Elbert. We represent the defendant IntelliCorp  
23 Records, Inc.

24 THE VIDEOGRAPHER: Will the court reporter,  
25 please swear in the witness.

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1 JANE ROE,  
2 the witness herein, having been  
3 first duly sworn, was examined  
4 and testified as follows:  
5

6 EXAMINATION

7 BY MS. CARUSO:

8 Q Good morning, Ms. [REDACTED], and thank you  
9 in advance for your time today.

10 Before we get started I'd like to go  
11 through a few ground rules with you.

12 I will be asking you questions today, and  
13 you're required to answer my questions truthfully.

14 Okay?

15 A Okay.

16 Q From time to time your counsel may object  
17 to a question, but unless he instructs you not to  
18 answer my question, you're required to answer it.

19 Okay?

20 A Okay.

21 Q I think the court reporter has already  
22 cautioned both of us about this, but please try to  
23 use words when you answer my questions. She won't  
24 be able to pick up a nod or a shrug.

25 A Okay.

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1 (The record was read as follows:  
2 "Q I am aware of a couple of  
3 Declarations. Do you remember  
4 which one, Ms. [REDACTED], you're  
5 talking about here?")

6 THE WITNESS: No.

7 BY MS. CARUSO:

8 Q Do you remember the substance of the one  
9 that you're talking about here?

10 A No, there were -- there were similar  
11 forms. I may refer to them all as Declarations  
12 because they all look the same to me, but we just  
13 reviewed through a few forms.

14 Q And in what way did they refresh your  
15 recollection?

16 A That I signed -- signed them, some of them  
17 were signed by me, and that we did review them in  
18 previous meetings.

19 Q I see.

20 MR. FOK: Can I just ask that you not pull on  
21 the microphone cable. Thank you.

22 THE WITNESS: Oh. I'm nervous. Sorry.

23 BY MS. CARUSO:

24 Q Ms. [REDACTED], do you understand that as a  
25 plaintiff in this case you have an obligation to

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1           A     Okay. Um, of the schools that I attended?

2           Q     Yes, and if you can recall the date that  
3 you graduated.

4           A     Okay. Well, high school would be Manual  
5 Arts High School. Graduation, I don't recall the  
6 date, but the year would be '97.

7           Q     That's fine.

8           A     Okay. I then went on to Southwest College  
9 to get my A.A. degree. Graduation would be from Cal

10 State L.A., was it 2000 -- my goodness. I'm just so  
11 nervous I can't recall the date.

12          Q     That's okay. We can look at a document  
13 that has it. That's okay.

14          A     Yeah, well, then I went on to my A.A.  
15 degree at Southwest College. I then transferred  
16 over to Cal State Los Angeles for my B.A. degree.  
17 Graduation date would be 2005 of June, and then I  
18 returned back to get my Master's, and my graduation  
19 date would be 2009.

20          Q     Okay, so just so that we can have the  
21 dates correct, maybe we will take a look at a  
22 document.

23                     (Exhibit 1 was marked for  
24 identification by the Reporter.)

25          MR. KIM: Thank you.

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1           Q     When you say a "file log," did you write  
2     in the file log?

3           A     No, I would just place the letters into  
4     this -- like a manila folder, place the letters into  
5     that when I would receive them. That was it.

6           Q     What else was in this manila folder, other  
7     than rejection letters?

8           A     That was -- in that particular folder that  
9     was it, just the letters that I would receive.

10          Q     And so it would have been from People's?

11          A     Yeah -- actually, no, People's did not  
12     send me a letter. That was just a bad, um,  
13     interview. That was one of my worst interviews that  
14     I have ever had, um. And that's why I shared that  
15     experience because it was just so bad for me.

16                 But rejection letters were the Kedrin, and  
17     I can't think of others at the moment, but just a  
18     lot of barriers for me due to the fact that I had my  
19     background in my job search, but I can't recall  
20     others at the moment.

21          Q     You can't recall a letter other than  
22     Kedrin?

23          A     Right.

24          Q     If you didn't write in the log why did you  
25     call it a journal?

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1           A       Basically because it kept track of written  
2 documents for me, and I just referred to it as a  
3 journal at that time.

4           Q       And if what it consisted of was a  
5 collection of rejection letters and nothing more, no  
6 writing on your part, how did that help you deal  
7 with your frustration?

8           A       For me it was just a part of my triumph,  
9 you know, because I knew that eventually I would get  
10 an acceptance letter, and that would be -- just to  
11 show myself that I didn't give up.

12                    You know, looking at those letters, just  
13 was a form for me, just to keep going. And then  
14 once I did receive an acceptance letter, I could  
15 look back and see all the denial letters, I got, but  
16 look where I ended up. So I just saved them for  
17 that reason.

18           Q       How many denial letters were there?

19           A       Um, they were from different caregiving  
20 jobs. Like the caregiving one that I got from  
21 BrightStar was in there, Kedrin was there.

22                    If I had like an interview and I did  
23 complete an application, and they would send me back  
24 a letter, I would save those letters. But I can't  
25 remember all of the different agencies that I had



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1 REPORTER'S CERTIFICATE  
2 OF  
3 CERTIFIED SHORTHAND REPORTER  
4

5 \* \* \* \* \*  
6  
7

8 I, THE UNDERSIGNED CERTIFIED SHORTHAND REPORTER, IN  
9 AND FOR THE STATE OF CALIFORNIA, DO HEREBY CERTIFY:  
10 THAT THE FOREGOING PROCEEDINGS WERE TAKEN BEFORE ME  
11 AT THE TIME AND PLACE THEREIN SET FORTH, AT WHICH  
12 TIME THE WITNESS WAS PUT UNDER OATH BY ME; THAT THE  
13 TESTIMONY OF THE WITNESS AND ALL OBJECTIONS AT THE  
14 TIME OF THE PROCEEDINGS WERE RECORDED  
15 STENOGRAPHICALLY BY ME AND WERE THEREAFTER  
16 TRANSCRIBED UNDER MY DIRECTION; THAT THE FOREGOING  
17 IS A TRUE RECORD OF THE TESTIMONY AND OF ALL  
18 OBJECTIONS MADE AT THE TIME OF THE PROCEEDINGS.  
19  
20

21 IN WITNESS WHEREOF, I HAVE SUBSCRIBED MY NAME ON:  
22 February 1, 2013.  
23  
24

25 \_\_\_\_\_  
LESLIE L. WHITE, CSR NO. 4148

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1 NAME OF CASE: Jane Roe v. Intellicorp Records

2 DATE OF DEPOSITION: Tuesday, January 22, 2013

3 NAME OF WITNESS: JANE ROE

4 Reason Codes:

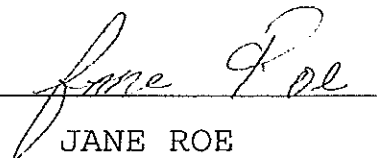
5 1. To clarify the record.

2. To conform to the facts.

6 3. To correct transcription errors.

7  
8 Page 62 Line 10 Reason 29 From Yes, that's correct to No10 Page 120 Line 21-22 Reason 211 From That's a typo... / date. to It is correct.12 Page 128 Line 15 Reason 213 From No to Yes14 Page 128 Line 17 Reason 215 From Yes to No16 Page 129 Line 11 Reason 217 From A friend to A sister18 Page 129 Line 19-21 Reason 219 From Um... /... /w... with her. to Yes.20 Page 129 Line 25 Reason 221 From I don't know. to Yes, it is.22 Page 129 Line 13-14 Reason 223 From I don't have ... /... with her.24 To In Los Angeles.

25



JANE ROE